

AO 106 FILED (04/10) Application for Search Warrant
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JAN 17 2018

UNITED STATES DISTRICT COURT

AT SEATTLE
 CLERK U.S. DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON
 BY DEPUTY

for the
 Western District of Washington

In the Matter of the Search of

(Briefly describe the property to be searched
 or identify the person by name and address)

The residence located at 3457 108th Avenue SE, Bellevue,
 WA 98004 and the Google email account
 paulbrunt2@gmail.com

Case No.

MJ18-026

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A-1 and A-2, which are incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B-1 and B-2 for a List of Items to be Seized.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

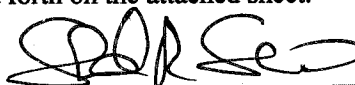
The search is related to a violation of:

Code Section	Offense Description
22 USC 2778; 18 USC 554	Arms Export Control Act; Smuggling

The application is based on these facts:

Please see Affidavit of HSI Special Agent Shad Severson

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

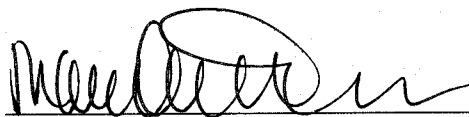
Shad Severson, Special Agent (HSI)

Printed name and title

Sworn to before me and signed in my presence.

Date:

Jan. 17, 2018



Judge's signature

City and state: Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge

Printed name and title

STATE OF WASHINGTON)
)
) SS
COUNTY OF KING)

AFFILIANT BACKGROUND

3. I make this affidavit in support of an application for a search warrant to search the premises located at 3457 108th Avenue SE, Bellevue, WA 98004 (the "SUBJECT PREMISES"), further described in Attachment A-1, which is incorporated

1 herein by reference. I seek authorization to seize the items that are described in
2 Attachment B-1, which is incorporated herein by reference.

3 4. I also make this affidavit in support of an application for a search warrant,
4 pursuant to Title 18, United States Code, Section 2703, for a warrant to search the stored
5 electronic communications contained in the following email account:

6 **paulbrunt2@gmail.com**

7 (the "SUBJECT EMAIL ACCOUNT"), as well as all other subscriber and log records
8 associated with this account. The SUBJECT EMAIL ACCOUNT is further described in
9 Attachment A-2, which is attached to this affidavit and incorporated herein by reference.
10 The SUBJECT EMAIL ACCOUNT is controlled by Google, Inc. This application seeks
11 a warrant to search the SUBJECT EMAIL ACCOUNT in order to seize the items listed
12 in Attachment B-2, which is attached to this affidavit and incorporated herein by
13 reference,

14 5. As discussed below, there is probable cause to believe that the SUBJECT
15 PREMISES contains evidence, fruits, and instrumentalities of violations of the Arms
16 Export Control Act ("AECA"), Title 22, United States Code, Section 2778, and Title 22,
17 Code of Federal Regulations, Section 127.1, as well as Title 18, United States Code,
18 Section 554. There similarly is probable cause to believe that the SUBJECT EMAIL
19 ACCOUNT contains evidence of these crimes.

20 6. The facts set forth in this Affidavit are based on my own personal
21 knowledge; information obtained from other individuals during my participation in this
22 investigation, including other law enforcement officers; interviews of cooperating
23 witnesses; review of documents and records related to this investigation; communications
24 with others who have personal knowledge of the events and circumstances described
25 herein; and information gained through my training and experience.

26 7. Because this Affidavit is submitted for the limited purpose of establishing
27 probable cause in support of the application for a search warrant, it does not set forth
28 each and every fact that I, or others, have learned during the course of this investigation.

RELEVANT LAW

8. The AECA generally prohibits the export of defense articles and services that are designated by the President. *See* 22 U.S.C. § 2778(b)(2). The AECA provides for criminal penalties for willful violations of the Act. *See* 22 U.S.C. § 2278(c).

9. The Department of State, exercising for the President the above authority under the AECA, has promulgated the International Traffic in Arms Regulations (“ITAR”), 22 C.F.R. § 120.1 *et seq.* These regulations include the Munitions List, which consists of categories of defense articles and services that cannot be exported without a license issued by the Department of State’s Office of Defense Trade Controls (“DDTC”). *See* 22 C.F.R. §§ 121.1, 123.1, 127.1.

10. Category I of the Munitions List includes firearms and their components. As a result, the export of firearms and/or their components generally requires an export license issued by the DDTC. There is an exemption for shipments of firearms components valued under \$100 in the aggregate, or a higher amount if the export is to Canada. Some firearms components, such barrels, are classified as “significant military equipment” and are not eligible for the exemption.

11. Title 18, United States Code, Section 554 makes it unlawful for anyone to fraudulently or knowingly export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States.

12. Title 15, Code of Federal Regulations, Section 30.6 provides that a shipper exporting items must provide the accurate value and description of the items that were shipped.

SUMMARY OF INVESTIGATION

A. The Recent Seizure

13. On November 27, 2017, the U.S. Government was notified that Turkish authorities in Mersin, Turkey (the Mersin Customs Enforcement Directorate of Smuggling and Intelligence) seized a shipment of undeclared weapons concealed within

1 two vehicles.¹ The vehicles were shipped from the Port of Seattle, via sea container, to
2 Mersin, Turkey. On November 28, 2017, HSI Seattle received information regarding the
3 seizure from the U.S. Customs and Border Protection (CBP) National Targeting Center,
4 Investigations (NTC) in Washington, D.C. The NTC provided HSI Seattle with
5 documentation related to the shipment, to include the Electronic Export Information
6 ("EEI")² filed for the shipment and the corresponding Sea Waybill.³

7 14. According to a review of the EEI, Paul Brunt was identified as the U.S.
8 Principal Party (*i.e.*, the exporter), with a referenced address of the SUBJECT
9 PREMISES. The EEI listed the ultimate consignee as AKMAR ULUS. NAK. SAN. VE
10 TIC., Camiserif Mah. Cemalpasa Cad, Yuksel Apt. Kat: 4, No: 11, Akdenz-Mersin,
11 Turkey. The EEI stated that the export date was September 14, 2017; the EEI was filed
12 on September 6, 2017. The forwarding agent was identified as Atlantic Express Corp,
13 7751 W. 88th Street, Bridgeview, IL 60455. The EEI further indicated that the shipment
14 consisted of two used vehicles, which were containerized. The vehicles were identified
15 as a 2016 Ford Mustang, VIN 1FA6P8AM0G5292936, and a 2016 Chrysler 200, VIN
16 1C3CCCAB7GN119865; both vehicles were listed as requiring no export license.

17 15. A review of the Sea Waybill identified the shipper as Atlantic Express
18 Corp. The consignee name and address on the Sea Waybill revealed the same
19 information as the EEI. Additionally, the description of the vehicles shipped, to include
20 the VINs, were also consistent with those listed on the EEI.

21 16. On December 13, 2017, investigators obtained records from Patterson Kia
22 of Arlington, TX, related to the purchase of the Ford Mustang vehicle identified by
23 Turkish Customs, which contained the seized firearms. According to the records, the
24 purchaser of the 2016 Ford Mustang, bearing VIN 1FA6P8AM0G5292936, was
25 identified as Paul Brunt, who listed his address as the SUBJECT PREMISES. The

26
27 ¹ The seizure received publicity overseas, including on Turkish television.

28 ² An EEI is the export data that generally must be filed either by the exporter or the freight forwarder with U.S. Customs whenever the export exceeds \$2,500, or if the goods require an export license.

³ A Sea Waybill is a document that reflects a contract of carriage and receipt of the goods being transported.

1 purchase records indicated the sale occurred on May 1, 2017, and the vehicle was paid
2 for by wire transfer in the amount of \$18,746.14. According to a representative of
3 Patterson Kia, Brunt did not conduct the transaction in person, but rather, he
4 communicated via the SUBJECT EMAIL ACCOUNT to purchase the vehicle. Patterson
5 Kia provided investigators with copies of email communication that occurred between
6 Brunt and representatives at the car dealership.

7 17. On December 14, 2017, investigators obtained records from Premier
8 Chrysler Jeep of Placentia, CA, related to the purchase of the Chrysler 200 vehicle, which
9 was the other vehicle identified by Turkish Customs as containing the seized firearms.
10 According to the records, the purchaser of the 2016 Chrysler 200 vehicle, bearing VIN
11 1C3CCCAB7GN119865, was identified as Paul Brunt, who listed his address as the
12 SUBJECT PREMISES. The purchase records indicated the sale occurred on July 8,
13 2017, and the vehicle was paid for by a trade-in of a 2015 Chrysler 300 vehicle and cash
14 in the amount of \$2,300.

15 18. On December 19, 2017, investigators obtained records from Atlantic
16 Express Corp related to the exportation of the seized vehicles. According to Atlantic
17 Express Corp, Brunt interacted with the Seattle branch of Atlantic Express Corp, in
18 person, to facilitate the shipment. The Seattle office was identified as Pacific Atlantic
19 Express Corp, 13008 142nd Ave East, Orting, WA 98360. The documents provided by
20 Atlantic Express Corp included the EEI, Bill of Lading, Conditional Delivery Agreement,
21 Master Bill of Lading, Dock Receipt, copies of the vehicle titles, a copy of Brunt's
22 passport and driver's license, and a signed Limited Power of Attorney/Authorization
23 Letter. The Limited Power of Attorney/Authorization Letter, which was signed by Brunt
24 and dated June 16, 2017, authorized Pacific Atlantic Express Corp. to act as a
25 "designated agent" to export vehicles from the U.S. Additionally, Brunt provided Pacific
26 Atlantic Express Corp with a typed document/note containing the following contact
27 information:

28 Owner (Shipper) – Paul Brunt (Paul Brunt LLC)

Contact: Paul Brunt
Address: 3457 108th Ave SE Bellevue, WA 98004
(i.e., the SUBJECT PREMISES)
Phone: 425 761-7772 email: paulbrunt2@gmail.com

TRANSPORT COMPANY – TURKEY TO KURDISTAN (IRAQ)
Company: Akmar Ulus Nak. San. Ve. Tic. Ltd. Sti.
Address: Camiserif Mah
Cemalpasa Cad. Yuksel Apt. Kat: 4 No. 11
Akdeniz-Mersin, Turkey Zip Code: 33060
Tex number: 0320280728
Tel: +90 324 238 2052-53
Fax: +90 324 238 2055
Email: farukakdag@akmarnak.com

Import Co. (IRAQ) : Oneil Co.
100m street
Besides the Customs Directorate
Erbil, IRAQ
License # - 6514
Phone: 964 750 447 18 86
Email: Oneilcarscompany@yahoo.com
Buyer Information: (Iraq) Saif Omer Khaili
Street 100m
Erbil, Iraq
Phone: 964 750 483 32 34 (473 23 82)
Email: Saifomer680@yahoo.com

19. Investigators conducted an export license history query that revealed Brunt has not registered, nor applied, for a license with the Directorate of Defense Trade Controls as an exporter of ITAR items. Moreover, the EEI and other export documents do not reference any export license having been obtained.

B. Brunt's Firearms Purchases

20. On November 29, 2017, Special Agent (SA) Claudia Grigore, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) conducted a query to determine whether any Seattle-area dealers holding a Federal Firearms License (FFL) had reported multiple gun sales for Brunt. The query identified eight incidents, yielding a total of

1 forty three firearms, beginning on October 5, 2016, and as recent as August 3, 2017. For
2 all eight purchases, the purchaser was identified as:

3 Paul Stuart Brunt
4 3457 108th Avenue Southeast (i.e., the SUBJECT PREMISES)
5 Bellevue, WA 98004

6 As for the details of the eight purchases:

7 21. First, on October 5, 2016, Brunt purchased fifteen firearms from LC Sports,
8 5925 156th Street SE, Snohomish, WA 98296. The firearms were identified by the
9 following make, model and serial numbers:

10 Glock 17GEN4; ABWG171
11 Glock 21GEN3; BBLX560
12 Colt; CJ58608
13 Smith & Wesson; FXX6888
14 HS Products (IM Metal) XDM; MG427275
15 Armscor of the Philippines (Squires Bingham) 1911A1; RIA1481854
16 Colt 1991A1; 2889505
17 Smith & Wesson M&P 9; HNB22917
18 Glock 19GEN3; BCMW865
19 Smith & Wesson; UFA2979
20 Colt Gold Cup Trophy; GCT48811
21 Sig Sauer 1911 STX; 54B130611
22 Taurus PT92; TIR51215
23 Glock 19GEN4; BCWF463
24 Glock 17GEN3; BCPA231

25 22. Second, on May 6, 2017, Brunt purchased five firearms from Washington
26 Military Depot, 20015 Mountain Hwy E, Spanaway, WA. The firearms were identified
27 by the following make, model and serial numbers:

28 Colt 1991A1; 2934123
Armscor of the Philippines; M1911-A1
Smith & Wesson M&P 45; HNK1971
Glock 17GEN4; BEGM344
Ruger SR1911; 671-53641

1 23. Third, on May 8, 2017, Brunt purchased five firearms from Ben's Loan
2 Pawnshop, 1005 S. 2nd Street, Renton, WA. The firearms were identified by the
3 following make, model and serial numbers:

4 Magnum Research Desert Eagle; DK0034825
5 Colt Government; CV43663
6 Glock 41GEN4; BAGA875
7 Glock 40GEN4; BDGM267
8 Wesson Arms RZ-45 Heritage; 1606136

9 24. Fourth, on June 3, 2017, Brunt purchased three firearms from LC Sports in
10 Snohomish. The firearms were identified by the following make, model and serial
11 numbers:

12 Sig Sauer 1911 C3; 54B151195
13 New Frontier Armory; EP06163
14 Walther Colt Government; WD036649

15 25. Fifth, on June 10, 2017, Brunt purchased four firearms from Ben's Loan
16 Pawnshop in Renton. The firearms were identified by the following make, model and
17 serial numbers:

18 Smith & Wesson M&P 40; NAV8182
19 Beretta, Pietro APX; A010414X
20 Sig Sauer P320 X-Five; 58B235271
21 Springfield Armory 1911A1; NM498910

22 26. Sixth, on June 15, 2017, Brunt purchased four firearms from Rehv Arms,
23 27623 Covington Way SE, Unit 2, Covington, WA 98042. The firearms were identified
24 by the following make, model and serial numbers:

25 Smith & Wesson M&P 9 Shield; HXP4127
26 CZ (Ceska Zbrojovka); C199252
27 CZ; C148842
28 Smith & Wesson M&P M2.0; HWN2245

1 27. Seventh, on July 31, 2017, Brunt purchased five firearms from Verle's
2 LLC, 741 West Golden Pheasant Road, Shelton, WA. The firearms were identified by
3 the following make, model and serial numbers:

4 Armscor of the Philippines Citadel; CIT024705
5 Metro Arms Corporation American Classic; A12-06348
6 Remington Arms Company; RHN63853A
7 Ruger SR9; 337-12423
8 Ruger SR40; 342-99201

9 28. Eighth, on August 3, 2017, Brunt purchased two firearms from Ben's Loan
10 Pawnshop in Renton. The firearms were identified by the following make, model and
11 serial numbers:

12 Glock 22GEN4; BBXG967
13 Smith & Wesson M&P M2.0; NAX6374

14 29. Investigators conducted a query of the Turkish gun seizure in open source
15 databases and identified a video from a Turkish media source. A review of the video
16 showed one of the seized guns, and close examination of the still video identified the gun
17 as having a serial number of 54B155779. On January 12, 2018, SA Grigore confirmed
18 through the ATF National Tracing Center that the serial number belonged to a Sig Sauer
19 pistol, model 1911, .45 caliber, which was purchased by Paul Brunt on April 14, 2017, at
20 a gun show in Monroe, WA. Additionally, the pistol was part of a multiple sale
21 transaction that included seven total handguns, and it was not reported appropriately by
22 the FFL. Therefore, the seven guns did not appear in the previous query conducted by
23 SA Grigore for multiple firearm purchases. The other six firearms purchased were
24 identified by the following make, model and serial numbers:

25 Springfield Armory Pistol XDS 45; S4127084
26 Armscor Pistol RI1911; RIA793914
27 Sig Sauer 1911; 54B104691
28 Walther PPQ; FCG1036
 HK Pistol USP45; 25-151970DE
 Armscor Pistol RI Tactical 1911; RIA1808109

1 **C. The Prior Export**

2 30. Investigators conducted queries of U.S. export records for Paul Brunt. The
3 queries identified one previous shipment on February 23, 2017. According to export
4 records for that shipment, PAUL BRUNT LLC was identified as the exporter; the address
5 listed was the SUBJECT PREMISES. The ultimate consignee was identified as Oneil
6 Co., 100M Street, Erbil, 44001, Iraq. The forwarding agent was identified as GEFECO
7 Forwarding USA, 1055 Stevenson Court, Unit 105W, Roselle, IL 60172. The records
8 further indicated that the shipment consisted of one used vehicle, which was described as
9 a 2015 Chrysler, VIN 1C3CCCAB6FN607302.

10 31. Further queries of U.S. export records identified two additional shipments
11 on February 23, 2017 that appeared related to this shipment. Both of the two additional
12 shipments indicated the same ultimate consignee and forwarding agent. According to
13 export records for the first of those two shipments, Hamza I. Dalawy was identified as the
14 exporter; he listed his address as the SUBJECT PREMISES. The exporter for the second
15 shipment was identified as Rawnd Khaleel, 3450 108th Ave SE, Bellevue, WA 98004.
16 (Note: The listed address of 3450 108th Ave SE is not a recognized address according to
17 King County parcel records.) The export records further indicated the first shipment
18 consisted of one used vehicle, which was described as a 2015 Mitsubishi, VIN
19 ML32A3HJ1FH032697; the second shipment consisted of one used vehicle, which was
20 described as a 2015 Dodge Charger, VIN 2C3CDXBG4FH835872.

21 32. As discussed below, Rawnd Khaleel, the person listed as the exporter for
22 the second shipment, has also been associated with the name "Rawnd Aldalawi."
23 Investigators conducted a search of "Rawnd Aldalawi" in law enforcement databases.
24 Investigators learned that a B2 tourist visa had issued for Aldalawi, for June 21, 2016
25 through June 19, 2017. According to the Visa application, Aldalawi provided his contact
26 address as 4885 Lakehurst Lane, Bellevue, WA. A subsequent search of this address in
27 King County records identified the owner of the property as Susan B. Long. Record
28 checks of this address in DOL databases identified two current driver's licenses

1 associated with 4885 Lakehurst Lane, Bellevue, WA. First, investigators located a
2 license for Martin Victor Brunt, who appears to be a relative of Paul Brunt. Second,
3 investigators located a license for Hamza Ismail Dalawy, the person listed as the exporter
4 for one of the two shipments described above.

5 33. Record checks also revealed that Dalawy listed his address as 4885
6 Lakehurst Lane, Bellevue, WA, on his most recent passport application, dated April
7 2016. Further record checks of Dalawy in DHS databases revealed a Currency
8 Transaction Report (CTR) that was filed about him on November 10, 2016, regarding a
9 cash withdrawal he made in the amount of \$16,000 from JP Morgan Chase Bank in
10 Issaquah, WA. According to the CTR, Dalawy identified his address as 2020 S. 108th
11 Street, Seattle, WA. Subsequent record checks of this address in King County records
12 identified the owner of the property as Paul Brunt.

13 34. Additional queries in DHS databases identified a FinCEN8300 report filed
14 in the name of Rawnd Kahaleel for a cash payment made in excess of \$10,000 (\$15,884).
15 The report, which was filed on December 13, 2016, related to the purchase of a 2015
16 Dodge Charger vehicle bearing VIN 2C3CDXBG4FH835872, which was the same
17 vehicle shipped by Khaleel on February 23, 2017, to Oneil CO. in Iraq. The report was
18 filed by Bob Hall Honda in Yakima, WA.

19 35. The FinCEN8300 report identified Kahaleel with a passport number of
20 A7192015, which revealed an address of 45610 Ahrawany, Erbil, Iraq. The date of birth
21 and passport number indicated for Kahaleel on the report are consistent with those
22 identified for Rawnd (Khaleel) Aldalawi. Further queries in DHS databases also
23 identified several FinCEN8300 reports filed in Brunt's name for cash payments made in
24 excess of \$10,000. One of these reports, which was filed on November 26, 2016, related
25 to the purchase of a 2015 Chrysler 200 vehicle bearing VIN 1C3CCCAB6FN607302,
26 which was the same vehicle shipped by PAUL BRUNT LLC on February 23, 2017, to
27 Oneil CO. in Iraq.
28

1 **D. The SUBJECT PREMISES**

2 36. Investigators conducted queries in the Washington State Department of
3 Licensing (DOL) databases, which revealed Brunt is the registered owner of five
4 vehicles, which were identified as a 2007 Volkswagen SD, bearing WA plate
5 #AHH7587; a 2005 Mazda, bearing WA plate #ATS6620; a 2016 Lexus SD, bearing WA
6 plate #BGA9449; a 2003 Mazda PK, bearing WA plate #CHK12; and a 2015 Chrysler
7 300, bearing WA plate #BIF4622. All five of the aforementioned vehicles are registered
8 in Brunt's name at the SUBJECT PREMISES. Additionally, DOL provided a driver's
9 license photograph of Brunt and identified his listed address as the SUBJECT
10 PREMISES. Investigators also conducted queries of King County Public Records that
11 identified the SUBJECT PREMISES as a single family residence owned by Paul and
12 Maria Brunt.

13 37. On November 30, 2017, SA Grigore conducted surveillance of the
14 SUBJECT PREMISES and identified four vehicles in the driveway that are registered to
15 Brunt. An additional car was present that was registered to Paul Brunt Jr. at the
16 SUBJECT PREMISES. Additionally, SA Grigore observed the following two vehicles
17 parked across the street from the Subject Premises: a Nissan Pathfinder, bearing WA
18 license BCJ9325; and a white Chrysler 200 vehicle, bearing CA license 7KML857.
19 According to law enforcement databases, the Nissan vehicle is registered to Norma
20 Hernandez Velazquez⁴ at 808 Temperance St, Kent, WA; and the Chrysler 200 vehicle is
21 registered to Paul Brunt at the SUBJECT PREMISES. (Note: It was later determined,
22 through law enforcement databases, that the CA license for the Chrysler 200 vehicle was
23 replaced by WA license BIF4622).

24 38. On December 12, 2017, HSI Seattle conducted surveillance of the
25 SUBJECT PREMISES and once again observed multiple vehicles registered to Brunt,
26 along with a vehicle registered to Brunt Jr.

27
28 ⁴ Her driver's license comes back to the SUBJECT PREMISES.

1 39. On this same date, HSI Seattle conducted surveillance of 4885 Lakehurst
2 Lane, Bellevue, WA and identified multiple vehicles registered to Martin Brunt, who is a
3 relative of Paul Brunt.

4 40. On January 9, 2018, investigators conducted surveillance of 2020 S. 108th
5 Street, Seattle, WA. At approximately 10:00 a.m., an individual who resembled
6 Aldalawi, based on previously obtained visa application photographs, departed the
7 residence at 2020 S. 108th Street and entered a white Chrysler 200 vehicle, bearing WA
8 license BIF4622. According to DOL records, the Chrysler vehicle is registered to Paul
9 Brunt at the SUBJECT PREMISES. During the surveillance, the Chrysler vehicle was
10 eventually followed by HSI Seattle to the neighborhood of the SUBJECT PREMISES;
11 however, contact with the vehicle was not maintained nor was the vehicle observed at the
12 SUBJECT PREMISES on this date.

13 41. On January 12, 2018, investigators conducted surveillance of the SUBJECT
14 PREMISES and observed Paul Brunt in the kitchen at approximately 7:00 a.m. At
15 approximately 8:20 a.m., investigators observed Brunt depart the SUBJECT PREMISES
16 in the white Lexus vehicle, bearing WA license plate #BGA9449, along with an unknown
17 white female. Investigators followed Brunt to Bellevue High School, where the unknown
18 white female exited the vehicle. Investigators subsequently followed Brunt back to the
19 SUBJECT PREMISES. On this same date, at approximately 1:30 p.m., investigators
20 again observed the white Lexus vehicle parked outside the SUBJECT PREMISES.

21 **E. Preservation of Certain Records**

22 42. I know from my training and experience that that federal law requires any
23 person or entity who exports defense articles to maintain records concerning the
24 manufacture, acquisition and disposition of defense articles for a period of five years.

25 43. In addition, I have participated in the execution of numerous search
26 warrants and know that individuals involved in export transactions generally keep a
27 variety of records relating to exports, including but are not limited to, correspondence,
28 contracts, invoices, purchase orders, bank records, financial statements, ledgers,

1 | spreadsheets, inventories, air waybills, shipping documents, bills of lading, customs
2 | declaration forms, and other paperwork used in the shipment of exports. Individuals
3 | often keep these items in their residences, particularly where individuals operate out of
4 | their residences. Individuals also keep these records for extended time periods, often
5 | years.

6 | 44. In addition, I know that individuals who purchase cars and firearms often
7 | have paperwork relating to these items in their residences that they keep for extended
8 | time periods, often years.

9 | 45. Based on the foregoing, I believe there is probable cause to believe that
10 | Paul Brunt maintains records related to the illegal exportation of firearms described
11 | above at the SUBJECT PREMISES.

12 | **F. The SUBJECT EMAIL ACCOUNT**

13 | 46. As discussed above, Brunt used the SUBJECT EMAIL ACCOUNT to
14 | purchase one of the cars that was used to hide some of the guns that were illegally
15 | exported to Turkey.

16 | 47. In my training and experience, I have learned that Google provides a
17 | variety of on-line services, including email access, to the general public. Google allows
18 | subscribers to obtain email accounts at the domain name google.com, like the email
19 | account listed in Attachment A-2. Subscribers obtain an account by registering with
20 | Google.

21 | 48. During the registration process, Google asks subscribers to provide basic
22 | personal information. Therefore, the computers of Google are likely to contain stored
23 | electronic communications (including retrieved and unretrieved email for Google
24 | subscribers) and information concerning subscribers and their use of Google services,
25 | such as account access information, email transaction information, and account
26 | application information. In my training and experience, such information may constitute
27 | evidence of the crimes under investigation because the information can be used to
28 | identify the account's user or users.

1 49. In general, an email that is sent to a Google subscriber is stored in the
2 subscriber's "mail box" on Google servers until the subscriber deletes the email. If the
3 subscriber does not delete the message, the message can remain on Google's servers
4 indefinitely. Even if the subscriber deletes the email, it may continue to be available on
5 Google's servers for a certain period of time.

6 50. When the subscriber sends an email, it is initiated at the user's computer,
7 transferred via the Internet to Google's servers, and then transmitted to its end
8 destination. Google often saves a copy of the email sent. Unless the sender of the email
9 specifically deletes the email from the Google server, the email can remain on the system
10 indefinitely. Even if the sender deletes the email, it may continue to be available on
11 Google's servers for a certain period of time.

12 51. A sent or received email typically includes the content of the message,
13 source and destination addresses, the date and time at which the email was sent, and the
14 size and length of the email. If an email user writes a draft message but does not send it,
15 that message may also be saved by Google but may not include all of these categories of
16 data.

17 52. A Google subscriber can also store files, including emails, address books,
18 contact or buddy lists, calendar data, photographs, and other files, on servers maintained
19 and/or owned by Google. In my training and experience, evidence of who was using an
20 email account may be found in address books, contact or buddy lists, email in the
21 account, attachments to emails, including photographs and files, and photographs and
22 files stored in relation to the account.

23 53. Subscribers to Google might not store on their home computers copies of
24 the emails stored in their Google account. This is particularly true when they access their
25 Google account through the web, or if they do not wish to maintain particular emails or
26 files in their residence.

27 54. In general, email providers like Google ask each of their subscribers to
28 provide certain personal identifying information when registering for an email account.

1 This information can include the subscriber's full name, physical address, telephone
2 numbers and other identifiers, alternative email addresses, and, for paying subscribers,
3 means and source of payment (including any credit or bank account number). In my
4 training and experience, such information may constitute evidence of the crimes under
5 investigation because the information can be used to identify the account's user or users.

6 55. Email providers typically retain certain transactional information about the
7 creation and use of each account on their systems. This information can include the date
8 on which the account was created, the length of service, records of log-in (i.e., session)
9 times and durations, the types of service utilized, the status of the account (including
10 whether the account is inactive or closed), the methods used to connect to the account
11 (such as logging into the account via Google's website), and other log files that reflect
12 usage of the account. In addition, email providers often have records of the Internet
13 Protocol address ("IP address") used to register the account and the IP addresses
14 associated with particular logins to the account. Because every device that connects to
15 the Internet must use an IP address, IP address information can help to identify which
16 computers or other devices were used to access the email account.

17 56. In some cases, email account users will communicate directly with an email
18 service provider about issues relating to the account, such as technical problems, billing
19 inquiries, or complaints from other users. Email providers typically retain records about
20 such communications, including records of contacts between the user and the provider's
21 support services, as well records of any actions taken by the provider or user as a result of
22 the communications. In my training and experience, such information may constitute
23 evidence of the crimes under investigation because the information can be used to
24 identify the account's user or users.

25 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

26 57. I anticipate executing the requested warrant for the SUBJECT EMAIL
27 ACCOUNT under the Electronic Communications Privacy Act, in particular 18 U.S.C.
28 §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Google to

1 disclose to the government copies of the records and other information (including the
2 content of communications) particularly described in Section I of Attachment B-2. Upon
3 receipt of the information described in Section I of Attachment B-2, government-
4 authorized persons will review that information to locate the items described in Section II
5 of Attachment B-2.

6 **REQUEST FOR NONDISCLOSURE AND SEALING**

7 58. As detailed above, this investigation remains very much ongoing. The
8 targets do not appear to know that U.S. authorities are investigating, that they know about
9 the volume of firearms purchased or the prior export, or other details of the investigation.
10 If they were to know about the full scope of the investigation, they could take steps to
11 frustrate the investigation, including tampering with or destroying evidence, or fleeing
12 from prosecution. Indeed, two of the potential targets of this investigation have ties to
13 overseas.

14 59. In light of these circumstances, the government requests, pursuant to the
15 preclusion of notice provisions of Title 18, United States Code, Section 2705(b), that
16 Google be ordered not to notify any person (including the subscriber or customer to
17 which the materials relate) of the existence of the requested email search warrant for such
18 period as the Court deems appropriate. The government submits that such an order is
19 justified because notification of the existence of this Order would seriously jeopardize the
20 ongoing investigation. Such a disclosure would give the subscriber an opportunity to
21 destroy evidence, change patterns of behavior, notify confederates, or flee or continue his
22 flight from prosecution.

23 60. It is further respectfully requested that this Court issue an order sealing,
24 until further order of the Court, all papers submitted in support of this application,
25 including the application and search warrant. I believe that sealing this document is
26 necessary for all of the reasons set forth above.

CONCLUSION

61. Based on the forgoing, I submit that there is probable cause to believe that the SUBJECT PREMISES contains evidence of the crimes identified above, and therefore I request authorization to search and seize the items that are described in Attachment B-1.

62. I similarly submit that there is probable cause to believe that the SUBJECT EMAIL ACCOUNT contains evidence of the crimes identified above, and therefore I request authorization to search and seize the items that are described in Attachment B-2. This Court has jurisdiction to issue the requested email search warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . . that - has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(I). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. Accordingly, by this Affidavit and Warrant I seek authority for the government to search all of the items specified in Section I, Attachment B-2 (attached hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of the data, documents and records that are identified in Section II to the same Attachment.



SHAD SEVERSON, Affiant
Special Agent, HSI

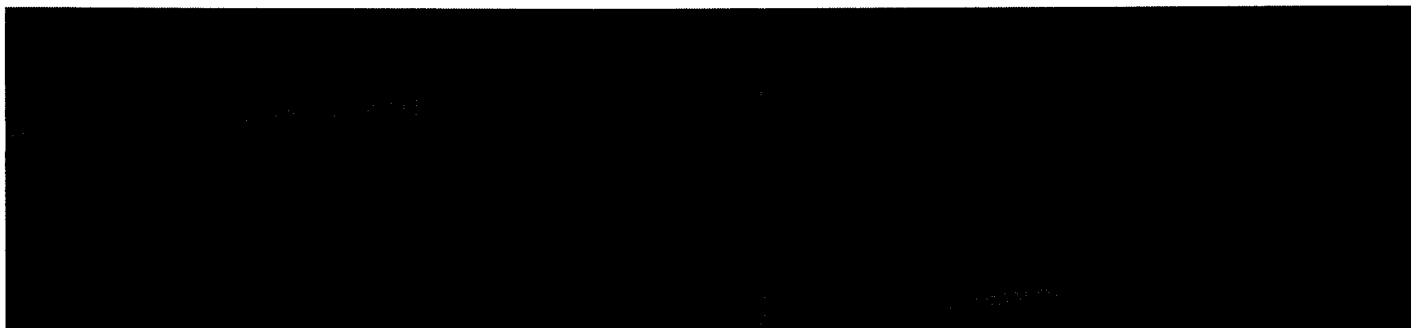
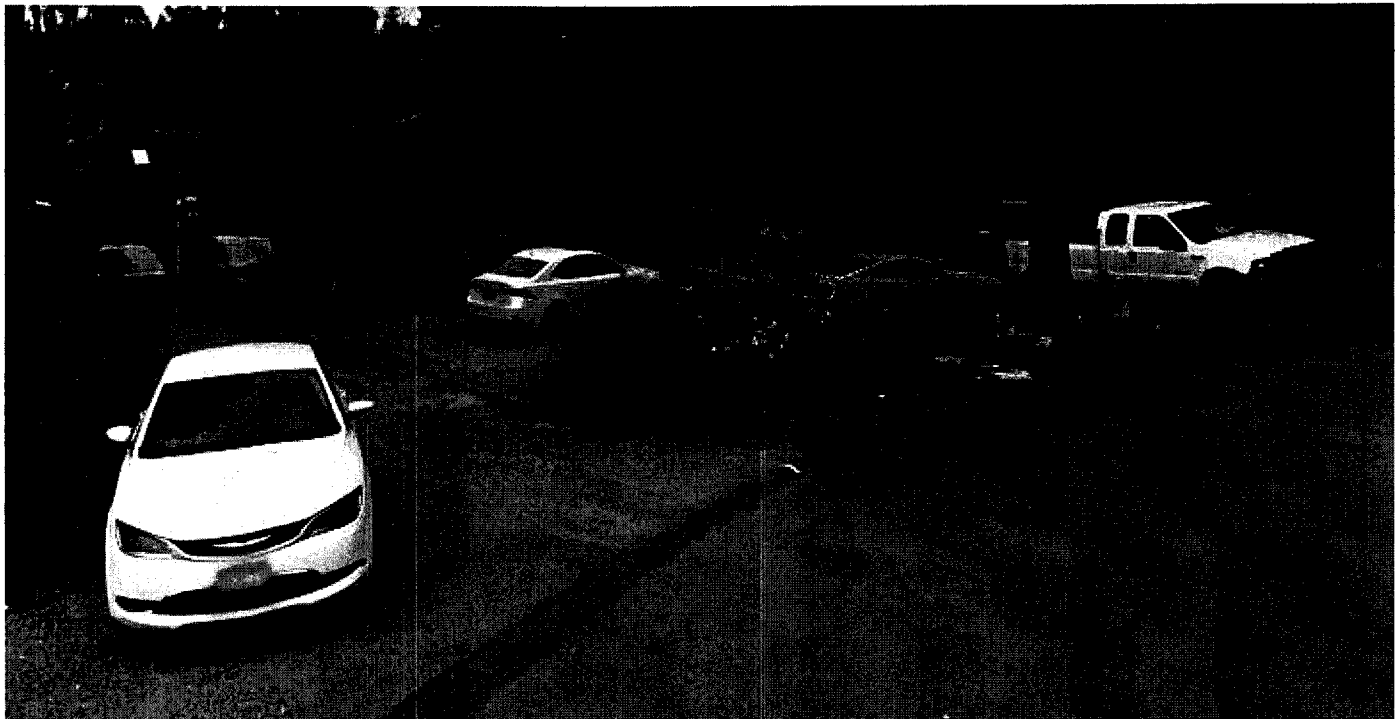
SUBSCRIBED AND SWORN before me this 17 day of January, 2018.



MARY ALICE THEILER
United States Magistrate Judge

ATTACHMENT A-1

The Subject Premises is located at 3457 108th Avenue SE, Bellevue, WA 98004, and includes the shed/outbuilding that is on the property. A picture of the property is below.



ATTACHMENT A - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

ATTACHMENT B-1

ITEMS TO BE SEIZED

All evidence, fruits, and instrumentalities related to violations the Arms Export Control Act, 22 U.S.C. § 2778, and the International Trafficking in Arms Regulations, 22 C.F.R. Part 120 et seq., as well as violations of Title 18, United States Code, Section 554, that is:

1. Firearms that are covered by the United States Munitions List, including:
 - (a) Non-automatic and semi-automatic firearms to caliber .50 inclusive (12.7 mm).
 - (b) Fully automatic firearms to .50 caliber inclusive (12.7 mm).
 - (c) Firearms or other weapons (e.g. insurgency-counterinsurgency, close assault weapons systems) having a special military application regardless of caliber.
 - (d) Combat shotguns, which include any shotgun with a barrel length less than 18 inches.
 - (e) Silencers, mufflers, sound and flash suppressors for the articles in (a) through (d) of this category and their specifically designed, modified or adapted components and parts.
 - (f) Riflescopes manufactured to military specifications.
 - (g) Barrels, cylinders, receivers (frames) or complete breech mechanisms for the articles in paragraphs (a) through (d) of this category.
 - (h) Components, parts, accessories, and attachments for the articles in paragraphs (a) through (g) of this category.
 - (i) Items designed to improve the functionality or accuracy of any firearms system.
2. Documents relating to any exports to Turkey or Iraq;
3. Documents relating to the export of any firearms or components that are covered by the United States Munitions List.
4. Documents relating to U.S. export or customs restrictions, regulations, provisions or laws.
5. Documents relating to the purchase of any firearms or firearms components that are covered by the United States Munitions List.

6. Documents related to the purchase or export of vehicles, including those under the name Paul BRUNT, Hamza DALAWY and Rawnd ALDALAWI (aka KHALEEL).
7. Documents relating to AKMAR ULUS. NAK. SAN. VE TIC, Oneil Co., or Atlantic Express Corp.
8. Packaging for firearms and firearms components that are covered by the United States Munitions List.
9. Documents relating to vehicle schematics, hidden or secret compartments in vehicles, or secreting contraband in vehicles.
10. Documents reflecting any payments for vehicles, export services, or firearms/firearms components purchases that are covered by the United States Munitions List.
11. Any address, contact books, or other documents containing address information reflecting those involved in any exports, purchase of firearms, or purchase of vehicles.
12. Documents sufficient to show dominion and control.

THIS WARRANT DOES NOT AUTHORIZE THE SEIZURE AND SEARCH OF DIGITAL DEVICES.

ATTACHMENT A-2
Account to be Searched

The electronically stored data, information and communications contained in,
related to, and associated with, including all preserved data associated with Google
account:

paulbrunt2@gmail.com

as well as all other subscriber and log records associated with the account, which
are located at premises owned, maintained, controlled or operated by Google, an e-mail
provider.

ATTACHMENT B-2**Section I - Information to be disclosed by Google, for search:**

To the extent that the information described in Attachment A-2 is within the possession, custody, or control of Google, including any e-mails, records, files, logs, or information that has been deleted but is still available to Google, Google is required to disclose the following information to the government for account or identifier listed in Attachment A-2:

- a. The contents of all e-mails associated with the account, including stored or preserved copies of e-mails sent to and from the account, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;
- b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- c. The types of service utilized;
- d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;
- e. All records pertaining to communications between the Provider and any person regarding the account, including contacts with support services and records of actions taken.

Section II - Information to be seized by the government

All information described above in Section I that constitutes evidence of violations of the Arms Export Control Act ("AECA"), Title 22, United States Code, Section 2778, and Title 22, Code of Federal Regulations, Section 127.1, as well as Title 18, United

1 States Code, Section 554, including, for the account or identifier listed on Attachment A,
2 information pertaining to the following matters:

3 a. All documents relating to the purchase of vehicles for export.
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ATTACHMENT B - 2
ITEMS TO BE SEIZED

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970